

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

PleasrDAO,

Plaintiff

v.

Martin Shkreli,

Defendant

Case No. 1-24-cv-04126-PKC-MMH

I, Martin Shkreli, hereby certify and state under penalty of perjury as follows:

1. I am the Defendant in the above-captioned action.

2. I submit this declaration in response to the Preliminary Injunction Order entered on August 26, 2024, which requires that I provide an inventory and account that includes the nature and volume of the copies of *Once Upon a Time in Shaolin* (the “Musical Work”) that I retained, the names and contact information of the individuals to whom I distributed the Musical Work, the date and method of such distribution; and the amounts, source, date, and nature of any proceeds, revenues, profits, or other financial benefits made by me from distributing or playing the Musical Work. ECF 30.

3. On August 23, 2024, my attorneys advised me that the Court ordered me to provide a list of all times that I shared the Musical Work.

4. On August 26, 2024, my attorneys advised me that the Court had issued a written order requiring that I provide a list of all the times that I shared the Musical Work and a list of the financial benefits that I have collected from sharing the Musical Work.

5. I have searched my devices, electronic accounts, and other personal effects, and have identified electronic copies of fifteen tracks of the Musical Work, which have been sequestered and turned over to my attorneys.

6. I have searched my devices, electronic accounts, and other personal effects, and have identified the following individual recipients of the Musical Work:

Approximate Date	Recipient Name	Method of transmission (e.g. email, direct message, livestream, physical copy, filesharing link)
7/31/2023	ajb425@cornell.edu	Email

7. Between 2015 and 2021, I recall occasionally sharing the Musical Work, primarily by sending digital files of the Musical Work to others via email. I also saved copies of the Musical Work on USB or other drives and gave those drives to others. Because I shared the Musical Work several times several years ago, I cannot recall each and every time that I have shared the Musical Work. However, I shared it with at least the email address identified above.

8. In addition to the above individual releases of the Musical Work, I shared the Musical Work on my social media pages or livestreams on the following occasions:

Date	Format	Recording (if available)
Approximately November 9, 2016	Live Stream	Recording available at <a href="https://www.youtube.com/watch?v=J2Zrk9MZWyQ">https://www.youtube.com/watch?v=J2Zrk9MZWyQ</a>
Summer 2024	Live Stream on X	N/A
Summer 2023	Live Stream on X	N/A

9. It is possible, and indeed I find it highly likely, that one of the many people who viewed, heard, or otherwise accessed the Musical Work via my social media recorded the Musical Work and retains a copy of the same.

10. The following financial benefits came to me as a result of my sharing the Musical Work:

Date	Amount	Source	Nature
2023-2024	<\$100	X Revenue Share	

11. I submit this declaration also in response to the Order entered on September 23, 2024, which requires that I specify the maximum number of tracks from the Musical Work that I retained copies of. (Text entry, no document attached).

12. Before transferring all copies of the Musical Work in my possession to defense counsel, I retained a copy of fifteen (15) tracks of the Musical Work.

13. After I transferred copies of fifteen tracks of the Musical Work to defense counsel, I deleted my copies, and I now no longer possess any copies of any tracks of the Musical Work. To the best of my knowledge, I do not have any additional tracks of the Musical Work in my possession to be transferred to counsel.

14. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Sep 30, 2024

EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_, 2024, at \_\_\_\_\_.

  
Martin Shkreli  
boxSIGN 4LR2RJQL-1J793Q89

Martin Shkreli

*Defendant*